

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

EZCORP, INC. SECURITIES
LITIGATION,

This document applies to: ALL CASES

No. 14-cv-6834-ALC-AJP

Hon. Andrew L. Carter, Jr.

CLASS ACTION

**LEAD PLAINTIFF’S NOTICE OF MOTION AND MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 23 and Magistrate Judge Peck’s November 29, 2016 Memo Endorsement ordering the Parties to submit their settlement papers to Judge Carter by December 23, 2016 (ECF No. 110), Lead Plaintiff Automotive Machinists Pension Trust (“Lead Plaintiff”), by its undersigned counsel, will and hereby does move, before the Honorable Andrew L. Carter, Jr., at the Thurgood Marshall United States Courthouse, 40 Foley Square, Courtroom 1306, New York, New York 10007, at a date and time to be determined by the Court, for entry of the Parties’ agreed-upon form of proposed Order Preliminarily Approving Proposed Settlement And Providing For Notice, and exhibits thereto, attached hereto, which, if entered, will:

- (1) Preliminarily approve of the proposed class action settlement which, if granted final approval, would resolve this Action in its entirety;
- (2) Certify the proposed Settlement Class for purposes of the Settlement only;
- (3) Approve of the form, content and manner of the class notices to Settlement Class Members; and
- (4) Schedule a hearing, and certain deadlines related thereto, on final approval of the Settlement, proposed Plan of Allocation and Lead Counsel’s motion for an award of attorneys’ fees and Litigation Expenses.

Lead Plaintiff's Motion is supported by the accompanying Memorandum of Law in Support of Motion for Preliminary Approval of Class Action Settlement ("Memorandum of Law"), and the Stipulation and Agreement of Settlement (with exhibits) filed simultaneously herewith as Exhibit 1 to the Memorandum of Law, and all prior proceedings in this Action.

Because the Motion is unopposed by Defendants, Lead Plaintiff respectfully requests that the Motion may be granted without a hearing. Settlement Class Members will then be sent Notice of the proposed Settlement and have an opportunity to respond in advance of the final Settlement Hearing.

Dated: December 23, 2016

Respectfully Submitted,
BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP

/s/ Timothy A. DeLange

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